

# Exhibit 2

## 3405-3

1 UNITED STATES DISTRICT COURT  
2 NORTHERN DISTRICT OF CALIFORNIA  
3 SAN FRANCISCO DIVISION  
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6 IN RE: JUUL LABS, INC., MARKETING,  
7 SALES PRACTICES, AND PRODUCTS Case No.  
LIABILITY LITIGATION 19-MD-02913-WHO

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12 VIDEO-RECORDED 30(B)(6) DEPOSITION OF  
13 SAN FRANCISCO UNIFIED SCHOOL DISTRICT  
14 REGARDING COMMUNICATION AND AWARENESS  
15 THROUGH ITS DESIGNEE QUARRY PAK

16 (Via videoconference)

17 Thursday, May 27, 2021  
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24 REPORTED BY:  
25 CYNTHIA MANNING, CSR No. 7645, CLR, CCRR  
JOB NO. 192989

1 little bit, I'm just going to refer to all five  
2 of those collectively at the "Altria  
3 defendants." If I need to be more specific,  
4 I'll identify a particular defendant.

5 Does that make sense?

6 A. Yes.

7 Q. Thank you.

8 One other thing, again, just to sort of  
9 speed things up a little bit. If I am referring  
10 to "the district" or "your district," I'm  
11 referring to San Francisco Unified School  
12 District.

13 Does that make sense?

14 A. Yes.

15 Q. Very good.

16 Are you aware of any action by the  
17 Altria defendants with respect to JUUL that  
18 increased underage vapor use at schools within  
19 the District?

20 A. What do you mean by "action" or  
21 "increased"? Like, I wouldn't know any details  
22 on that.

23 Q. Do you contend that the Altria  
24 defendants did anything that increased underage  
25 vapor use at the schools within the district?

1 A. I don't have any knowledge of that, no.

2 Q. Do you know whether the Altria  
3 defendants provided any services to retail  
4 locations within the District?

5 A. I don't know that.

6 Q. To your knowledge, did the Altria  
7 defendants provide shelf space at any location  
8 within the district?

9 A. I do not know that.

10 Q. To your knowledge, did the Altria  
11 defendants ever provide advertisements for JUUL  
12 products within the District?

13 A. We don't have JUUL advertisements  
14 within our School District.

15 Q. Do you know whether the Altria  
16 defendants ever provided any JUUL advertisements  
17 within the geographical area covered by the  
18 District?

19 A. I wouldn't know that information.

20 Q. Does the District have any knowledge  
21 that the Altria defendants provided any shelf  
22 space in San Francisco?

23 A. I wouldn't know that information  
24 either.

25 Q. Does the District have any knowledge

1 that the Altria defendants provided any retail  
2 services within San Francisco?

3 A. I wouldn't know that.

4 Q. And when you say you wouldn't know  
5 that, do you understand you're testifying on  
6 behalf of the San Francisco Unified School  
7 District?

8 A. Yes. We wouldn't know that.

9 Q. Okay. Thank you. Just wanted to  
10 clarify.

11 A. Yes.

12 Q. To your knowledge, did the Altria  
13 defendants ever market JUUL products to minors?

14 A. I'm not sure when Altria bought Juul,  
15 but we were aware of that. And so they're one  
16 and the same at some point. So I'm not sure  
17 what the specifics are.

18 Q. Okay. Well, my question was a little  
19 more specific. And I'm asking whether the  
20 Altria defendants ever did anything to market  
21 JUUL products to minors?

22 A. I wouldn't know that.

23 Q. To your knowledge, did any student  
24 enrolled at a school within the District ever  
25 receive an advertisement in the mail from the

1 Q. To your knowledge, did the Altria  
2 defendants take any action to assist JUUL?

3 A. I don't have that knowledge.

4 Q. To your knowledge, did the Altria  
5 defendants provide any assistance to JUUL that  
6 resulted in underage vapor use?

7 A. I don't know that.

8 Q. Has the District received any feedback  
9 from parents about how it approached the  
10 increase in vapor use at schools within the  
11 district?

12 A. No.

13 Q. Has the District received any criticism  
14 from parents about how it handled underage vapor  
15 use at schools within the District?

16 A. No, just a lot of questions.

17 Q. And what kinds of questions do you  
18 recall receiving from parents?

19 A. Just that they don't know what these  
20 items were or how to talk to their kids about  
21 them. They didn't even know if their kids were  
22 using them.

23 Q. Do you recall --

24 A. So it was just more health education  
25 type -- like, what should I look for.